MANITOBA GOVERNMENT RESPONSE

TO THE FEDERAL GREEN PLAN

Manitoba

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INTRODUCTION TO THE MANITOBA GOVERNMENT RESPONSE

The Manitoba Government Response to the Green Plan was prepared via an interdepartmental working group process, involving all provincial government departments and public agencies. This response is comprised of three sections; **Comments on Sustainable Development and the Green Plan, Comments on Specific Sections of the Green Plan Framework Document, and Other Issues.**

The Manitoba Government commends the Federal Government for initiating the Green Plan, including its comprehensive consultation process, which is intended "To make Canada the industrial world's most environmentally friendly country by the year 2000."

In preparing this response, the Manitoba Government has reviewed the Green Plan Framework Document from a sustainable development perspective. In general, the following major areas of concern should be enhanced or addressed within the Green Plan:

- Political leadership and commitment for implementing sustainable development,
- Trade-offs inherent in environment-economy integration, and the need for strategic choices,
- Reform of decision-making processes and structures,
- Implementation of sustainable development in the public sector and associated institutional changes critical to the success of sustainable development,
- Preparation of sustainable development strategies,
- Practical means for adaptation of lifestyles for sustainable development,
- Harmonization of standards, taxes, and regulations among jurisdictions for implementing sustainable development,
- Clarification of the roles and powers of the Federal and provincial governments
- Communicating sustainable development, and
- Utilization of appropriate analytical tools for implementing sustainable development.

COMMENTS ON SUSTAINABLE DEVELOPMENT AND THE GREEN PLAN

The Green Plan Framework Document states that the Government of Canada's goal is "to ensure that the activities of businesses, individuals, communities, and government are consistent with the concept of **sustainable development**." The Government of Manitoba supports this goal, believing sustainable development is the most appropriate goal for The Green Plan. Sustainable development is also a priority of our government's environmental and economic agenda. Sustainable development addresses issues that transcend provincial and national borders, and we believe it is most important that this process of decision-making become a Canadian priority, to be encouraged nationally and internationally.

Although sustainable development is identified as the main goal underlying the Green Plan, it does not appear to be adequately addressed or focused within the Framework Document.

1) There appears to be no attempt made within the Framework Document to clarify the thrust, scope and fundamental features of sustainable development. It would have been beneficial if this was approached at the outset, and used to shape or guide the Green Plan. The Government of Manitoba has adopted a series of ten principles and six guidelines for sustainable development, as recommended by the Manitoba Round Table on Environment and Economy, which indicate our interpretation of this concept (Attachment "A"). These principles and guidelines are now used to govern and shape decisions, policies and actions towards attainment of our vision of environmentally sound and sustainable economic growth for Manitoba. These tenets have been adapted for use by the National Round Table on Environment and Economy for developing a set of National principles. The Manitoba Government would encourage the Federal Government to identify its interpretation of sustainable development within the Green Plan, ensuring that the scope and coverage of this interpretation is reflected within the Green Plan. The Manitoba Government would welcome the opportunity to work with the Government of Canada on this.

2) The Green Plan Framework Document appears to be concerned almost exclusively with achieving greater environmental protection. While this is clearly an appropriate and important objective to be pursued in developing the Green Plan, it is perhaps, too narrow a focus for addressing sustainable development. Sustainable development embodies both environmental protection and economic development, and recognizes both as imperatives. The following notes outline this point from the perspective of the Manitoba Government:

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a) Little reference is made to the economy and how it is changing. The manner in which these changes might influence or be influenced by the environment and initiatives to protect the environment are not discussed. The linkage between the trend toward an information intensive economy and sustainable development needs to be examined, as do strategies to harmonize these two major thrusts. An information intensive economy can increase productivity and economic competitiveness while reducing demands for energy, resources, inputs, and waste. It is in Canada's best environmental and economic interests to promote this type of economy; yet there is no recognition of this fundamental strategic perspective in the Framework Document.

b) The Green Plan Framework Document does not specifically deal with the development of environmental industries. A conscious strategy is required to foster industrial development within the recycling, energy conservation, environmental management, and alternative energy sectors, among others. The prospect of achieving environmental protection targets could be jeopardized if these sectors do not develop at a pace commensurate with the present rate of political commitment. Such industries can contribute the infrastructure and resources required for the effective implementation of environmental management programs.

c) There appears to be little discussion regarding potential impacts of contemplated environmental protection measures on existing industrial and economic sectors. At the very least, economic sectors which could potentially be adversely affected should be identified, and strategies presented to reduce the impacts on stakeholders in these sectors. A similar approach to that used in addressing possible adverse consequences of the Canada - US Free Trade Agreement would be warranted, given the pervasive implication of many proposed environmental protection measures.

d) There appears to be no commitment to develop a federal fiscal policy which supports the implementation of sustainable development. The Federal Government should assume this critical leadership role.

3. The Government of Manitoba would suggest that the profile of land allocation and land use issues should be raised within the Green Plan, while ensuring that provincial jurisdiction is respected. Our experience has been that land-related matters can have a tremendous influence on the environment (eg. industrial location, residential subdivisions, roads). Even within the narrower context of environmental protection, the Green Plan would be incomplete without addressing land use issues.

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The Manitoba Government recently conducted an elaborate public consultation process towards a Land and Water Strategy for the Province. The attached report, which summarizes public input from this process, identifies many of the relevant issues related to land allocation and use (Attachment "B").

4. Complex problems demand integrated solutions. While The Green Plan Framework Document states that the environment is an integrated system, and recognizes the need to reform decision making processes and institutions, it is largely written from the perspective of existing institutions. As a result it is narrowly focused and compartmentalized.

   The general impression appears to be that sustainable development and environment-economy integration will be achieved through a series of separate and non-related program and policy initiatives "added on" to the existing system. This is the traditional approach which, at best, has not been successful in solving our problems, and at worst, has only further complicated these problems.

5. In the final version of the Green Plan, the Manitoba Government strongly suggests that an economic development strategy be included, which guides an enlightened fiscal policy; encourages environmentally sound economically sustainable activity; and helps manage adverse economic consequences of needed environmental protection measures.

6. The roles and mandates of the National Round Table on the Environment and the Economy (as well as the Provincial Round Tables), the International Institute for Sustainable Development, the Canadian Council of Ministers of the Environment, and other relevant federal/provincial deputy minister level committees, in the achievement of Canada's sustainable development, should be identified and related to the action plan. The Manitoba Round Table on Environment and Economy has spent much time shaping its strategies and policies for recommendation to the Manitoba Government, including the entrenchment of meaningful public consultation.

7. The Federal Government should provide leadership in the area of sustainable development, not only to the provinces and territories, but also to the rest of the world. Included in this leadership role however, is a requirement for partnership. The provinces, territories and the federal government must cooperate in the management of Canada's environment. This requires consultation and coordination in the development of national standards, guidelines and legislation. There is an obvious role for the Canadian Council of Ministers of the Environment, and other bodies, in ensuring consultation and in coordination of this process.

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8. The Federal Government should provide the necessary resources required for research, including support to industrial initiatives. The Green Plan should also relate Canada's openness towards less developed countries. Technology, training, data and information should be part of the federal government's environmental and economic technology transfer to the developing world. In some instances, funds should be made available to developing countries to support their programs. Funding of all projects and programs, within Canada and the rest of the world, should be based on principles of sustainable development.

9. We should look for solutions to the causes of the problems, not the symptoms. We need to adopt a preventative approach to dealing with the environment and the economy.

10. Health should be seen as one of the goals of sustainable development.

11. We need development in order to relieve poverty both here in Canada and abroad. Emphasis should, however, be placed on development that is sustainable. Development planning must be integrated with planning for environmental protection and sustainable yields. Economic development and environmental protection should be part of the same institutions and policies.

12. The Federal Government should commit itself to the preparation and implementation of a public sector strategy. A copy of Manitoba's approach is enclosed (Attachment "C"). It could easily be adapted to:

    - Entrenching the principles of sustainable development.

    - Ensuring integrated, multi-disciplinary decision-making throughout the federal system, including all departments, crown agencies and corporations.

    - Examining fundamental change in both the structure and operation of the federal system. For example, forums and interdepartmental staff and cabinet committees, which are mandated to oversee and ensure integrated project planning and policy development from a sustainable development perspective, should be established.

- Ensuring that the "causes" of our environmental/economic problems and not just the "symptoms" are addressed by;

    - altering the mandate of all departments, agencies and corporations to include responsibility for ensuring sustainable development and environment-economy integration;

    - requiring open decision-making and policy development processes which are based on meaningful public participation and dialogue;

    - reviewing the present sectoral - centralized approach to government organization, which distances itself from the spatial, regional, community and group issues, and needs of sustainable development and environment-economy.

    - Ensuring that policy formulation and implementation embodies the principles and processes of sustainable development.

13. The necessity to integrate programs, activities and organizations should be more fully acknowledged. Both linkages and partnerships between groups such as the Canadian Environmental Advisory Council, the National Round Table on Environment and Economy, the Inter-Provincial Heritage Advisory Committee, and the National Marine Council, to name only a few, need to be addressed and publicized. Similarly, linkages need to be developed and/or strengthened with non-government groups. Once established, these linkages must be nurtured into permanency. Partnerships, on the other hand, may be either project specific and short term, or activity specific and long term.

    Clear linkages among various pieces of legislation should be established and should be visible. How, for example, will the Environment Act and the pending Canada Oceans Act be linked? Also, linkages should be made between other programs and thrusts. As an example, the Green Plan Framework Document addresses water in several ways but what are the linkages between water and wetlands?

    Could a nationwide systems plan for wetlands, including peatlands, complement a number of water programs and vice versa? Can National parks be linked to sustainable development as models of what can be done in the areas of waste reduction, re-cycling and minimizing overall environmental impacts? Such a thrust would be a most pragmatic educational tool in the sustainable development arena.

COMMENTS ON SPECIFIC SECTIONS OF THE GREENPLAN FRAMEWORK DOCUMENT

IMPROVING DECISION-MAKING

The Green Plan framework identifies better science, more information about environment, education, legislation and economic instruments as factors leading to better decisions.

1. **Science:**

   - The Federal Government should ensure that science and technology are more effectively used by policy makers, industry, business and the public. Research into the linkages between the environment and the economy should be supported. The Federal Government should display the lead role in supporting science.

   - The International Institute for Sustainable Development provides all jurisdictions with unique opportunities for long-term research. The Green Plan should recognize, support, and utilize this organization.

2. **Information and Education:**

   The proposals outlined by the Federal Government in the area of information and education are supported by the Manitoba Government. The solution to many environmental problems requires public education.

   However, from an environment-economy thrust, the Federal Government, in cooperation with the provinces and the territories and non-government organizations, should develop a strategy for sustainable development education which will promote awareness and understanding of environment-economy linkages throughout the public and private sectors.

   - Sustainable development education should be part of all educational curricula. Schools need to integrate the principles of sustainable development with all their programs, especially in the areas of science and social studies.

   - The Federal Government should provide funding for sustainable development education projects. The needs, which are identified in this section, as they relate to universities and Provincial Governments, will be difficult to achieve without addressing and making a commitment to significant federal funding. In addition, there is a need to recognize and support the various colleges and technical schools.

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- The Eco-Logo program should be expanded to provide timely information to consumers on environmental implications of products. As well, the Federal Government should consider establishing national advertising and marketing standards, including legal guidelines. The Environmental Partners Fund mandate could be expanded to fill this void rather than establishing another funding agency.

- Accessibility of fundamental information must consider not only the kinds of information needed, but also the way this information is to be disseminated. This is especially true when considering remote communities.

3. **Legislation and Regulation:**

It is essential that there be provincial coordination and involvement in the development of national standards and guidelines. It appears, from the Green Plan Framework Document, that the Federal Government's role would be to develop standards and regulations; and that the provinces would administer and enforce these through administrative agreements. The Federal Government should re-examine its role by encouraging and coordinating the development of consistent national standards rather than legislating within provincial government jurisdictions. There needs to be a clear delineation of responsibilities between the provinces and the Federal Government in the area of the environment, in order to avoid a duplication of effort and resources, and to help ensure consistent standards across the country.

Coordinated work should continue through CCME and the Round Tables to ensure a national approach to environmental and economic management in Canada. Sustainable development should be incorporated into all intergovernmental dealings, including agreements.

4. **Economic Instruments:**

More emphasis on studying economic instruments may not be warranted. If "full cost accounting" is introduced, we may move towards full environment-economy integration, by applying this principle now and learning from its application.

While sustainable development is fundamentally linked to economic development and its instruments, the detailed discussion the Federal Government intends to initiate makes no mention of provincial/territorial/municipal governments. The approach should be more comprehensive in order to recognize the role other jurisdictions have in determining and implementing economic instruments.

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5. **Changing the Decision-Making Process:**

This section of the Green Plan Framework Document involves the adjustment of policies and laws, adoption of codes of environmental stewardship, and conducting audits. While these are required, what is also needed is a fundamental change in management philosophy, structure, procedures, planning and ethics. This would best be achieved, as stated earlier, by undertaking and implementing a comprehensive public sector strategy. However, the following additional comments are made.

a. Government has a broader role to play than that of business-developer and policy-maker. A more reflective consideration of what government and its agencies do would help to focus the need for changing the decision-making process. For example, Manitoba has identified the roles of the public sector to be: Leader; Legislator-Regulator; Developer and Promoter of Development; Consumer; Administrator; Enforcement Officer; Manager of the Institution, Natural Resources, and Environment; Partner in National, International and Provincial Affairs, with business and NGO's; Communicator/Educator; and Researcher. All of these areas need to be addressed from a sustainable development perspective.

b. A comprehensive review of legislation, etc. is supported if the intent is to entrench the principles of sustainable development, and this implies that the operational policies of the Federal public sector must also be consistent with sustainable development.

c. We might suggest that rather than creating an Environment Cabinet Committee, a Sustainable Development Committee committed to environment-economy integration should be established.

d. All agencies and departments must be held responsible for ensuring that their decisions and the processes by which they are arrived at are consistent with sustainable development. This responsibility should not to lie with only one department.

e. Environment-economy integration is essential. The National Task Force on Environment and Economy emphasized the need to bring multi-stakeholders into the decision-making process. Greater support for a more integrated approach should be pursued via all Provincial Round Tables.

6. **Strengthening Partnerships**

The Manitoba Government recognizes the need to strengthen partnerships as a role for the public sector. The following suggestions are made:

a. Partnerships must be built to foster sustainable development and must be based on public participation, understanding and respect.

   Meaningful involvement of individuals, communities, special interest groups, etc. must be ensured. If partnerships are fostered in a narrow sense (solely on "environmental" issues, or on "educational" efforts) there is a danger that their involvement will be "fringed". For example, would having an "environmental advisory committee" comprised of aboriginal peoples, enable native people to have desired input into decisions that effect environmental, economic and social consequences in their lives?

b. The Federal Government not only needs to support international efforts to address environmental problems, but must also consider the environmental, economic and social ramifications of all foreign affairs decisions. The International Institute for Sustainable Development should play a key role in these efforts.

c. Sustainable development sub-agreements, not necessarily new agreements, should be considered, and new programs for youth etc. should be framed to support sustainable development. There should be a move to collective agreements among provinces, and not the present emphasis on individual, separate agreements.

d. National standards are necessary, even though they will be difficult to achieve. They are needed but must account for local situations, and be developed on the basis of thorough consultation and dialogue.

e. The effectiveness of ENGOs may be partially based on their ability to distance themselves from government policy. Accordingly, "increasing their effectiveness" should be a decision which government leaves up to the public.

f. Aboriginal considerations must be of paramount concern for all governments, but this is especially true for the Federal Government in light of its responsibility for status Indians.

g. The linkages with native economic, education and training programs will be essential to successful participation by aboriginal people.

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ACTION ON ENVIRONMENTAL ISSUES

The Manitoba Government commends the Federal Government's proposed initiatives concerning the environmental aspects of the Green Plan. However, we do have some suggestions which might enhance these initiatives.

A. ENVIRONMENTAL STRESSES

1. Toxic Substances:

The term "toxic substances" must be clearly defined, the same tests and the same parameters must be used by all groups in the scientific community. The work currently being done by the federal government in the area of priority substances is very good, but the timetable should be accelerated. Existing legislation should be reviewed to remove overlaps or duplication in application (e.g. The Fisheries Act, The Transportation of Dangerous Goods Act, The Canadian Environmental Protection Act).

2. Waste Management:

It is important that "waste" be defined, and that a distinction be made between hazardous waste and solid waste. The solid waste reduction target of 50% is already in place and a national protocol for packaging has already been issued. The Federal Government should continue to take the lead in hazardous waste legislation covering transportation. Standards, guidelines, and codes of practice should be developed in concert with the provinces for significant waste management areas such as bio-medical wastes, tires, used oil, etc. The Federal Government should take responsibility for the development of national data bases for such items as quantities and types of solid wastes generated across the country, and for the evaluation of various waste treatment processes.

3. Environmental Emergencies:

Closely tied to the area of toxic substances is the response to environmental emergencies. The role of the Federal Government should be to assist provincial response systems, by providing resources, educational, and technology support to the provinces. The "on-site" role of the Federal Government at environmental emergencies should be limited to areas under specific federal jurisdiction (e.g. Indian reserves, Coast Guard, etc.).

B. THE GLOBAL COMMONS

1. Atmospheric Change:

The Federal Government should increase its research efforts in this area so that potential problems or threatening situations can be uncovered before they become extremely serious. For example, scientists were aware of ozone depletion for over fifteen years before controls were instituted. An integration of strategies is also required, for example, NO_x and VOC reductions could possibly be achieved through a carbon dioxide management plan which sets definite stabilization and reduction targets.

Global Warming

While the Green Plan Framework Document gives a thorough description of global warming and its possible effects, a more comprehensive approach may be useful within the Green Plan itself. The following suggestions are made:

Issues to be Addressed:

- Adequate and reliable information on the problem.
- Greenhouse gas emission targets.
- Mechanisms to achieve objectives.
- Impacts of mitigative actions.

What Needs to be Done:

- Continue, and enhance climate research, but prudent action should be taken now in order to mitigate greenhouse gas emissions. This is important because, if the greenhouse effect is proven to be a crisis, it may be too late to effect a solution, due to the cumulative nature of the problem.

- First, set targets to stabilize greenhouse gas emissions over a given period, followed by reduction targets, doing what is feasible and recognizing regional economic impacts. Undertake benefit/cost analysis for each province and territory with their cooperation and input. Canada should work closely with the international community on coordinated efforts, but should be prepared to assume a leadership role, taking unilateral action where necessary and feasible.

- Promote and support energy conservation and efficiency as one of the most effective ways to reduce CO_2 and other energy related greenhouse gas emissions. The environmental and in many cases economic benefits of conservation and efficiency are a plus, even if the global warming scenario fails to develop as predicted.

- Promote and support energy substitution, particulary renewable and alternative fuels in place of fossil fuels.

- Support the development and application of energy efficient and pollution control technologies.

- Promote integrated forest management, in order to utilize, among other goals, the "carbon sink" qualities of forests.

- Develop strategies to minimize other sources of greenhouse gases (eg.industrial and transportation emissions (CO_2, N_2O), landfill (methane), refrigerants(CFCs).

- Provide adequate federal funding for mitigative measures, especially energy efficiency.

How to Achieve Desired Results:

- Develop and disseminate information on energy and global warming, energy end-use data, and also mitigative measures. Conduct a public education campaign.

- Promote research, development and demonstration of appropriate measures and technologies to control and reduce greenhouse gas emissions.

  Provide financial incentives and disincentives to promote more efficient energy use and application of alternative energy. Use fiscal measures to develop a level playing field for demand and supply side energy options. Where environmental taxes are levied, the costs and benefits should be carefully weighed.

- Develop minimum national standards and guidelines in consultation with the provinces and territories (eg., energy efficient appliances and motors, building codes, vehicle fuel efficiency, and emission controls).

- Develop, promote and support analytical techniques which allow Provinces, Utilities, Suppliers, and Consumers to assess all energy planning activities from a sustainable development perspective, including life-cycle cost comparisons and trade-offs between alternate energy sources, conservation activities, economic, environmental and social costs and benefits.

- In order to properly assess energy options and determine the nature and degree of federal support for new energy projects, full life-cycle costs and benefits should be reflected (eg., environmental and social, as well as economic impacts; nuclear power-waste disposal, accident liability, decommissioning etc.)

- Support infrastructure change (eg., mass urban transit; availability of cleaner burning transportation fuels)

- Consult thoroughly with energy stakeholders, and provinces and territories on impacts of any environmental policies to be adopted by the federal government; and coordinate with the provinces on environmental impact assessments.

Ozone Depletion

The leadership of the Federal Government on this issue is critical, as Canada on the whole, contributes only a small part to the global problem. The Federal Government should show global leadership by ensuring the phase-out of the use of CFCs and halons in Canada as quickly as possible, ensuring appropriate technology transfer to developing countries, and providing support for funding arrangements to ensure the phase-out of CFCs and halons in developing countries. The Montreal Protocol should be reopened to ensure a complete ban on CFC and halon use and production in the industrialized world as soon as possible. Other ozone depleting substances, such as methyl chloroform and carbon tetrachloride should be added to a list of priority substances requiring phase-out.

Acid Rain

The Federal Government should expand its research efforts in this area to include NO_x, dry deposition, and the impact of acid rain on human health. The Federal Government should ensure that agreements, similar to the one in place for Eastern Canada, are developed for the remaining provinces to ensure a reduction in sulphur dioxide emissions. The Federal Government should participate in technology transfers with developing countries to ensure sulphur dioxide reductions and evaluate the contribution of NO_x to acid rain.

Air Quality

The approach that the Federal Government has outlined in the Green Plan could be broadened. The Federal Government should assume a leadership position in the development of air quality objectives and national emission guidelines for differing industry categories and in the development of standards. Similarly, research needs to be done on the problems posed by various products (to avoid crises like ozone depletion and CFC use). Treaties should be negotiated with the U.S.S.R. and the U.S.A. to ensure the reduction targets of transboundary flow of air pollutants.

2. Water:

One important issue that has not been addressed in the Green Plan is cooperative protection of existing clean water so that expensive future mitigation is not required. In addition, the Federal Government should place a high priority on the protection of interprovincial and international transboundary waterways. The Federal Government should recognize and accept provincial responsibility for water in order to avoid duplication of efforts and resources.

The Federal Government should commit to ensuring fundamental aquatic research is undertaken in order to resolve specific water quality concerns. The development of an action plan for the long-term protection of good water quality is also suggested. Water must be viewed and clearly described both as a fundamental element of environment, within a resource management context. Water should be identified and dealt with as a renewable resource.

The Federal Government should address water issues on a more regional basis. The Federal Government should undertake more cooperative programs with the province in order to address specific regional needs and issues. Provinces might seek more joint funding (eg., The Canada Water Act) to resolve specific large scale environmental issues including rural water supply, drainage services, and flooding.

The Federal Government should formulate an action plan for the long-term protection of the existing potable water supplies in many parts of the country. The importance of maintaining a statistically valid water quality data base cannot be underestimated. A large effort should be initiated immediately to educate the public in all phases of water quality and environmental management.

The problem of wetland destruction and Federal Government interest in the issue should be fully addressed in the Green Plan. Wetlands have a multitude of ecological and socio-economic values beyond that of wildlife habitat, including flood control and filtration. These wetlands have been rapidly disappearing, largely due to drainage of privately-owned land. The Green Plan should include initiatives regarding wetland preservation directly under Federal jurisdiction, ie., issues involving Federal lands as well as modifications to current programs and practices on private land. To be effective, the policy should address the problems associated with drainage of wetlands on privately-owned agricultural lands. Although this is a resource management issue that falls largely within provincial jurisdiction and interests, the Federal Government can play a role particularly in education to change attitudes, in assisting the provinces in providing economic incentives, and changing federal agricultural policies.

The Federal Government, through the Farm Credit Corporation, frequently obtains ownership of fragile or environmentally sensitive farmlands. These properties should be carefully reviewed regarding appropriate, alternate land use.

The use of water to dilute and flush wastes is a major, often overlooked use, which could be addressed within the Green Plan.

The Manitoba Government strongly supports the option of increased monitoring programs. The Federal Government is the most appropriate jurisdiction to undertake and promote water-related research, especially related to toxins, pesticides and nitrates as they affect groundwater, surface water and human health.

The Federal Government should ensure that a Drinking Water Safety Act does not duplicate Federal and Provincial Health Acts and Regulations.

The Manitoba Government agrees that water pricing is an important conservation/management tool. However, it is not clear what role the Federal Government can play in influencing water pricing, since the responsibility for resource management rests with the provinces. The proposed national conference is seen as positive step toward directing attention to the need for water pricing.

C. SUSTAINING OUR RENEWABLE RESOURCES

The presentation of the Framework Document does not appear to address renewable resources in a manner which recognizes that they are components of ongoing cyclical, natural systems. The Green Plan should acknowledge a commitment by the Federal Government to integrated resource planning and management. Environmental repair is but one component of the solution. An appreciation of the overall impacts and feedbacks from our natural systems should be addressed within the Green Plan. The following comments are offered.

1. Agriculture:

Agriculture is a major industry in Manitoba, as in much of Canada. A broad base of processing and manufacturing industries depend on this economic sector. Sustaining this economic development while conserving the natural resources on which it depends is a major challenge to be addressed within the Green Plan. Great care must be taken to ensure that the transition to increased sustainability in agriculture does not fundamentally affect Canada's ability to produce agricultural products and provide economic opportunities for rural Canadians.

- It appears that the current tone in the Green Plan has some presumption of guilt on the part of the agricultural industry which may not be warranted. All current activities and attitudes appear to be viewed as contrary to sustainable agriculture. Significant, positive activities undertaken by the industry are underway and should be encouraged.

- Soil loss and degradation is one of the most serious environmental issues facing agriculture and society in general. The recent Federal/Provincial soil conservation program, "The Soil and Water Accord," is a successful example of inter-jurisdictional cooperation. Much more needs to be done; the Manitoba Government would encourage the development of new programs.

- The federal and provincial governments, and farm groups are taking an increasingly pro-active position, with respect to the relationship between agriculture and the environment. The Green Plan should support these efforts.

- Further examination of environmental issues is necessary before some agricultural practices are discouraged. For example, the pesticide glyphosate is nearly environmentally neutral, and a key input to many producers practising conservation farming; yet there is great public concern about all herbicide useage. Similarly, other agricultural practices with beneficial trade-offs must be closely examined.

- Farmers, in their business operations, must respond to the incentives and signals of the market place. Related government policies and programs should be carefully reviewed to ensure their effectiveness, including strong consideration of environmental implications.

2. **Forests:**

The forest component within the Green Plan Framework Document could address sustainable development in a more comprehensive manner. Forest issues are broad and involve much more than the timber component of forest resources. Indeed, forests provide environmental, social, recreational and economic benefits. In Manitoba, development and implementation of a sound forest strategy will allow realization of the full potential of the forest resource. (Attachment "D" is the Manitoba Government's draft policy framework for forests.)

The Manitoba Government would suggest that the Green Plan address the following issues related to forests: the need to integrate environmental and economic values of forest resources; competitiveness of forest industries; harmonization of trade practices and environmental standards nationally and internationally; and the need for expanded markets and new technologies for both environmental and economic efficiency.

The need for integration of special needs and aspirations of local people, especially Native Canadians, into development plans and decision making should also be acknowledged within the Green Plan. The Federal Government can provide leadership in this area, in a spirit of partnership and cooperation.

In 1987, a National Forest Sector Strategy for Canada was proclaimed by the Canadian Council of Forest Ministers. It recognized, from an economic, social, and environmental point of view, that the benefits derived from the country's forests make it Canada's most valuable natural resource. The Green Plan should reflect this commitment by Forestry Canada to the principles of sustainable development.

3. **Fisheries**

- Recent federal involvement in regional environmental issues, such as the Oldman River and Rafferty-Alameda projects emphasizes the need to clarify federal and provincial jurisdictional responsibilities, legislation, and processes involving environmental assessment, including fish habitat impact. While constitutional legislation grants the federal government responsibility for managing fisheries in general, the role of administering sections of the Fisheries Act dealing with inland fisheries has been assumed by the provinces. Recent court decisions have raised the profile of fish habitat issues in the Prairie Provinces, and the spectre of greatly increased federal involvement in fish management.

- Federal/Provincial administrative agreements regarding environmental review processes, including fish habitat management, are needed to minimize duplication of administrative efforts. Such agreements can serve to direct staff and financial resources toward increasing our knowledge of the science of natural resource mitigation, enhancement and rehabilitation, and permit a progressive approach to achieving sustainable development goals.

D. PRESERVING ECOLOGICAL AND HERITAGE RESOURCES

The Green Plan Framework Document notes a number of significant topics regarding the preservation of ecological and heritage resources. It appears that the discussion and outline may be focused too narrowly, and exclusively on National Parks and Historic Sites. A national vision for a federal and provincial network of protected areas and heritage resources should be recognized within the Green Plan, and developed in consultation with the provinces.

- There is a need for a basic inventory of cultural and natural heritage resources throughout Canada so that informed decisions can be made when trade-offs must occur. Significant resources that must oe preserved and protected should be identified as priority areas. However, the inventory should not become the end product, but simply the initial step.

- There is a need to define the full spectrum of protected areas, from pristine wilderness to multiple use regions, in order to determine the appropriate rigor of protection with respect to expected use. There is also a need to evaluate the current and available mechanisms for protecting cultural and natural resources, and to identify gaps both in the mechanisms and the current system of protected areas.

- The federal government should show leadership to ensure that all stakeholders are invited to develop a truly national system of protected areas and heritage resources. The National Round Table could play a key role in this process.

- As suggested in the Framework Document, protected areas and heritage resources can be part of the educational process. They should be models of sustainable development, links with the past, and resources for the future. Federal legislation may be required in areas such as: ecological resources, endangered species, and heritage resources.

- Funding is a very important consideration. The network of protected areas and heritage resources must be adequately funded. This may require the reallocation of existing funds, and possibly, the infusion of some new funds. The user pay principle should be encouraged.

1. **National Parks and Historic Sites:**

Park systems and park agencies with their traditional mandate of conservation, preservation, tourism, outdoor recreation, and more recently, environmental and cultural education, have been widely perceived as having a central role to play in achieving the goals of sustainable development.

There is a need to integrate parks into national environment-economy strategies while promoting, fostering, and building commitment to a sustainable development park mandate.

- Clear environmental goals and benchmark standards should be developed and implemented rigorously with respect to all commercial activities, recreation development and park operation and maintenance facilities. Recreational opportunities should be managed in a way that allows for the sustainability of diverse park experiences.

- The Federal Government should promote basic ecological research and the preparation of biological inventories on park lands to provide a sound basis for resource management decisions. The development of a set of indicators to monitor environmental change could be useful in determining the effects of management, and the need for improved management activities. Park-based research provides an additional benefit by contributing information for park interpretive programmes.

- Standards and protocols need to be developed which ensure the comparability and transferability of information between various national and international data bases. Additional emphasis should also be placed on analysis, synthesis, integration and dissemination of information in a comprehensive and useable form.

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- Non-Governmental Organizations (NGO's), including universities, scientific, private, and community groups, should be encouraged to participate in natural/cultural resource management within parks. Such organizations often reach target groups which public agencies cannot.

- Park interpretive programming should promote the principles of sustainable development, and should be aimed at achieving lasting changes in societal behaviours and attitudes towards the environment and economy. Urbanization has served to make much of society less sensitive of its own environmental impacts.

- Support for international programmes such as "The Biosphere Reserve Programme" and the Ramsar Convention should be strengthened. This international exchange of information continues to be a major benefit while the designation of sites under such programmes demonstrates the acceptance of responsibility for preserving significant sites as part of the biological heritage of all humankind.

2. Wildlife:

- The Green Plan Framework Document recognizes that wildlife is an integral component of Canada's natural heritage, and an essential element of healthy and diverse ecosystems. The changing role of wildlife in Canadian society could be noted within the Green Plan. Traditional uses of wildlife, such as hunting and trapping have declined while other uses have risen. Adventure tourism and wildlife viewing can also provide sustainable economic opportunities to rural regions. Strong public attitudes regarding the maintenance of abundant wildlife populations and the preservation of endangered or declining species can be translated into support for public programs to achieve these goals. An increased variety of species have value to Canadians today. The Green Plan should recognize that holistic ecosystem management must replace management practices aimed at a single species and its habitat.

- The Green Plan gives equal weight to the problems of habitat loss, poaching, overuse, and toxic contamination but does not appear to address their causes. Today's issues also include unregulated commercialization of wildlife, co-management of wildlife resources with aboriginal peoples, problems associated with wildlife-human contact, the spread of disease from wildlife populations to humans (eg. Lyme disease), and the paradox of managing wildlife as a public resource on private lands. The latter is of particular importance in agricultural areas of Western Canada where a disproportionate number of our endangered plant and animal species are found.

- The Federal Government and the provinces have a number of co-operative wildlife conservation programs, the most notable being the North American Waterfowl Management Plan (NAWMP), which is also in co-operation with the United States. The NAWMP is the largest single wildlife program ever attempted and may be a model for future programs. An added benefit of the NAWMP is that by working closely with farmers, it also addresses soil degradation, rural economic development, and sustainable agriculture.

- The importance of wildlife to the environment could be more fully recognized within the Green Plan. Wildlife (all species of wild animals and plants) and habitat are integral components of ecosystems, and thus the Canadian environment. The health of wildlife populations, and their habitat are primary indicators of the state of the environment. These may be used as benchmarks for measuring performance in environmental protection.

- A set of guiding principles should be adopted in the Green Plan which recognize the need for management programs based on an ecosystem approach, which replace existing programs which have a single species focus. A good starting point would be the guiding principles of the draft National Wildlife Policy.

- The Federal Government should endeavour to identify, and remove barriers to the maintenance and enhancement of wildlife habitat on private lands inherent in federal taxation and agriculture legislation and policy.

- The proposed National Wildlife Policy for Canada sets out broad objectives. The twelve components of that policy might be incorporated into the Green Plan as a conceptual framework for action.

- Federal legislation should be enacted to regulate international trade in wildlife and to protect endangered species in Canada. Recovery plans for endangered, threatened and extirpated species, as listed by the Committee on the Status of Endangered Wildlife in Canada, should be formulated and the necessary funds allocated for their implementation.

- Priority should be given to completing and maintaining a comprehensive network of protected areas to preserve unique and representative samples of ecosystem types and endangered or limited habitats.

E. PROTECTING THE ARCTIC ENVIRONMENT

Northern Communities:

The Northern region has a substantially greater proportion of aboriginal residents than other parts of Canada. Domestic use of natural resources continues to be important to aboriginal population. The Green Plan should give recognition of the following:

- The institution of a planning process which will accommodate consideration of development needs of the northern communities.

- Involvement of people of northern communities in planning, development processes, and other initiatives.

- The need to ensure the ability of communities to benefit from resource development and use.

- The need to enable residents of northern communities to adapt to changing resource markets, and to achieve economic diversification and self sufficiency.

- The Green Plan should recognize the human and environmental outcomes of Northern development, and the continuing need to manage social and environmental impacts and costs.

- There should be a financial commitment by government and non-government organizations to ensure participation of all relevant resource users in Northern resource management and economic development.

OTHER ISSUES

From the perspective of the Manitoba Government, the Green Plan would benefit by addressing several other important factors which are critical for the successful integration of environmental and economic factors in decision-making. Sustainable development requires that these factors be considered in order to maintain the focus of Canada's environmental efforts and to send a clear and concise message to Canadians and to the World.

The following ideas are presented to launch discussion in these "new" areas for which the Province of Manitoba would be prepared to assist.

1. Economic Initiatives

The nature of response from the business community is critical for the successful application of sustainable development in Canada. The following comments represent some possibilities as proposed by the Manitoba Government. Although each area require further, detailed discussion, these thoughts are offered as guidance for a more ambitious federal/provincial initiative. It is sufficient to note that in these areas of economic adjustment both federal and provincial jurisdictions will need to coordinate efforts and cooperate in implementation.

Technology Transfer: The Green Plan Framework Document proposes a method by which better science may lead to improved decision making with future partnerships. One specific strategy which should be addressed is the commercialization and transfer of technology into the private sector.

Market Adjustment Process: The Green Plan Framework Document sets the conditions for economic rationalization within industries that are dislocated or disrupted due to environmental initiatives. Perhaps it should consider the effects that would be felt by displaced workers and, in certain cases, whole communities. A well developed sustainable development action plan should also include exploring economic and human resource alternatives, such as facility refurbishing, worker retraining and community redevelopment programs.

Incentives: The Green Plan Framework Document considers the issue of market based incentives and regulations. The Manitoba Government would suggest that caution is warranted in that neither the market incentive nor regulatory approach can be relied upon to adequately change economic behaviour and support environmental enhancement. A course of action may be a strategy which first blends both approaches and, after some obvious progress, gradually removes regulation. In the long term, however, market mechanisms should be used in place of regulations, wherever possible, to achieve environmentally sound and economically sustainable allocation and use of our natural an developed capital resources.

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Consumer Awareness: The Green Plan Framework Document notes that consumers, through their purchasing power, can regulate the marketplace and direct industries to produce more environmentally friendly products. The process by which consumers may become equipped with the information necessary to make these judgements should be detailed. The federal government, through its purchasing power, could take the lead and provide an example to other businesses and consumers.

Environmental Industries: The Green Plan Framework Document sets the strategy but a clearer definition of the opportunities arising from increased environmental awareness may be warranted. A formal process to develop and enhance environmental businesses should be included in the implementation phase. Federal program leadership could act as a catalyst in this area.

Trading: The Green Plan Framework Document could deal with trading relationships, and the perception of Canada, which our trading partners may hold as a result of a more far reaching environmentally sensitive domestic policy. In assessing options, Canada should encourage other countries to undertake similar measures.

Hazardous Waste Disposal: Waste management is a critical issue confronting Canadian industries. Technological development, capital investment and regulatory integrity are required to deal with this issue.

Evaluation Criteria: In order to achieve our objective, Canadian industry and government must adopt sustainable development as the universal principle for planning, policy making and investment decisions. Sustainable development should be more than an environmental guide for both the public and private sectors; it should be openly stated and applied in project review and used to encourage innovative solutions, with the Federal Government leading by example.

Rules: Canadian industry is caught in the middle of overlapping, evolving environmental authorities and jurisdictions. Better compliance is possible through public and private sector cooperation.

Sustainable Development Audits: The Green Plan Framework Document suggests environmental audits as a technique to encourage industry support and suggests making them compulsory and public. Sustainable development audits, which would also include emergency preparedness, occupational health and safety issues, energy management, and economic efficiency may be more applicable to the private sector, organizations, and agencies. Sustainable development codes of conduct may also be appropriate in situations where highly competitive markets are involved.

2. Land and Urban Issues

Sustainable development deals with our (human) relationship to the earth. The concept strives to provide clean, safe and healthy land, air and water for present and future generations.

Human Settlement: The Green Plan Framework Document addresses land in respect to such activities as agriculture, forests, wildlife and parks. Perhaps the Green Plan should also address the issue of land for human settlement in the context of sustainable development.

Regional Development: Policies should be developed which encourage balanced growth in all regions of the country, and a more equitable distribution of population, in order to minimize the consequences of over concentration.

Efficient Services: Consideration should also be given regarding the provision of municipal services, utilities, education and social services.

Transportation: Transportation shapes the pattern of urban development. The development of policies relative to public transportation and fossil fuel usage can play a significant role in determining whether our large urban centres grow upward or outward. The siting of major facilities such as airports and railyards can affect patterns of urban growth.

3. Role of the Federal Government

While it is recognized that the primary responsibility for land use rests with the Province, the Federal Government has an important role to play in land use planning through:

Regional Strategies: The Federal Government has a potential leadership role to play in the area of sustainable regional economic development strategies. At the national level the Federal Government has a major opportunity in spatial distribution. Support from the Federal Government in the decentralized relocation of its services and in influencing business and industry to locate to secondary centres is important.

Funding: The Federal Government should provide financial support to those centres which make efficient use of their land resources and to smaller communities, consistent with provincial sustainable development strategies.

Research: The Federal Government should serve as a research and information agency for national and international resource and land use issues/trends, for new, efficient environmental and economic processes and systems.

Federal Land: The administration of federally owned land presents a practical avenue for direct and meaningful cooperation in terms of natural resource management, environmental protection, and sustainable development. The Federal Government could undertake a general leadership role in assisting provincial and local governments in finding effective solutions to local urban/settlement environment-economy concerns, and stimulating regional or local opportunities.

CONCLUSION

We are proud that both the Federal Government and the Province of Manitoba have played prominent roles in advancing the concept of sustainable development. We share a similar vision for positioning our nation at the frontier of the global environment-economic challenge. The Province of Manitoba would support and encourage cooperation with the Federal Government, to the greatest extent possible, in order to develop comprehensive and equitable solutions to both our domestic and global environmental and economic problems.